

November 15th, 2017

Alice Carlton, Forest Supervisor
Umpqua National Forest
2900 NW Stewart Parkway
Roseburg, OR 97471

RE: Umpqua River Closure, Emergency Fire Closure, ORDER NO. 06-15-00-17-385

Dear Supervisor Carlton,

I am writing in response to your Emergency Fire Closure, ORDER NO. 06-15-00-17-385, signed October 20th, 2017 with an end date of January 31st, 2018. Under 36 CFR § 261.52 (e), the order includes a complete closure for boating on the North Umpqua River from Soda Springs Dam to the National Forest Service Boundary. We believe this order is overly restrictive and not justified; it is unclear why the river is "closed to boating" but not other activities given that the north and south shore banks are open from Horseshoe Bend Raft Launch to Wright Creek Campground and the north bank is open from Wright Creek Campground to National Forest Service Boundary.

On the topic of Water Safety, the Forest Service Manual states the following:

2354.41b - Water Safety

The manager's role in safety is advisory and informational. Provide opportunities for the river recreation user to become informed of current river flows, equipment and experience minimums and hazards. The user must make the final decision about whether or not to engage in the recreation activity.

We support efforts of the Forest Service to communicate information on trees that have entered the river creating strainer hazards and stand ready to assist through our website and communication channels. Wood hazards on rivers in the Pacific Northwest are extremely common and can be an issue at any time. Opening and closing a river in response to wood hazards establishes a standard of care that is inconsistent with Forest Service policy as outlined in the Forest Service Manual and sets a false expectation that the river is safe and free of hazards once the river is reopened.

We request that the Forest Service immediately reopen the river, provide information on known hazards that can be posted at access points and on our website, and make it clear that new wood hazards can enter the river at any time.

We appreciate your attention to this matter, and are prepared to work with you to restore access to the North Fork Umpqua River. If there is any way we can be of assistance please don't hesitate to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. O'Keefe', with a long horizontal stroke extending to the right.

Thomas O'Keefe, PhD
Pacific Northwest Stewardship Director